

**IN THE WESTERN DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**EVDOKIA NIKOLOVA,
Plaintiff**

VS.

**UNIVERSITY OF TEXAS AT AUSTIN,
Defendant**

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CIVIL ACTION

NO. 1:19-CV-00877-RP

JURY REQUESTED

**PLAINTIFF’S UNOPPOSED MOTION FOR ONE WEEK EXTENSION
TO FILE MOTION FOR ATTORNEYS’ FEES AND BILL OF COSTS**

TO THE HONORABLE ROBERT PITMAN:

Counsel for Plaintiff Evdokia Nikolova, Ph.D., (“Dr. Nikolova” or “Plaintiff”) respectfully files this unopposed request for an additional 7 days to file Plaintiff’s motion for attorneys’ fees and a bill of costs, with supporting documentation and shows the Court as follows:

1. This Court entered an Order (Dkt. #104) on Monday, August 22, 2022, in response to Plaintiff’s Motion For Judgment (Dkt. #99). In the Court’s Order, in addition to ruling on Plaintiff’s compensatory and backpay damages and interest, the Court directed Dr. Nikolova to file a motion for reasonable attorneys’ fees and a bill of costs, with supporting documentation no later than September 6, 2022, pursuant to Local Rules CV-7(j)(1) and CV-54(a). The Court also ordered the parties to file a joint status report on or before September 6, 2022 regarding any additional briefing on front pay or motions to amend the Court’s Order regarding front pay.

2. Dr. Nikolova respectfully requests a one-week extension, until Tuesday, September 13, 2022 to file her motion for attorneys’ fees and bill of costs, with supporting documentation.

3. Dr. Nikolova’s counsel has been preparing for a motion for attorneys’ fees and costs well before the Court’s Order on August 22, 2022, directing the filing of such a motion. However, the anticipated motion relates to proposed reasonable attorneys’ fees and costs that are voluminous

and consist of thousands of time entries and numerous supporting documents. An additional week is necessary for Dr. Nikolova's counsel to properly brief and present her attorneys fees to the Court in manner that will allow the Court to more easily review and expeditiously rule on the matter.

4. The time within which the Court order Plaintiff to prepare and file the motion for attorneys' fees and costs also falls over the Labor Day weekend when the undersigned legal counsel had previously committed to plans for an extended weekend vacation with family that are not easily changeable. Even without the Labor Day holiday, however, an extension would be necessary and requested because of the volume of work and the time involved with presenting Dr. Nikolova's attorneys' fees and costs.

5. As set forth in the below certificate of conference, Plaintiff's counsel conferred with counsel for defendant, University of Texas at Austin, who do not oppose this motion.

6. Additionally, this motion for a one-week extension to file Plaintiff's motion for attorneys' fees and cost will not affect the parties' response to the Court's Order that the parties to file a joint status report on or before September 6, 2022 regarding any additional briefing on front pay or motions to amend the Order regarding front pay. Plaintiff's counsel has conferred with opposing counsel and will be filing a status report as ordered.

7. This motion is not filed for the purposes of delay but only to ensure that the briefing filed with the Court is appropriate and will assist the Court in the resolution of the pending matter.

PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Plaintiff's counsel respectfully requests an additional 7 days, until Tuesday, September 13, 2022, to file Plaintiff's motion for attorneys' fees and costs, and such other and further relief as the Court determines justice and fairness so require.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for Defendant who stated they do not oppose this motion.

/s/ Robert W. Schmidt
Robert W. Schmidt

CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2022, this document was served pursuant to Federal Rules of Civil Procedure on counsel for Defendants at the following address:

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/s/ Robert W. Schmidt
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